

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

THE CURATORS OF THE UNIVERSITY OF)	
MISSOURI and CAPITAL REGION)	
MEDICAL CENTER)	
)	Case No. 2:22-cv-04100-NKL
Plaintiffs,)	
)	
vs.)	
)	
CORIZON HEALTH, INC., and)	
CORIZON, LLC,)	
)	
Defendants.)	

JOINT PROPOSED SCHEDULING ORDER/DISCOVERY PLAN

Pursuant to Fed. R. Civ. P. 26(f) and L.R. 16.1 and subject to Plaintiff's motion to remand (Dkt. 7-8), counsel for the parties have conferred and submit the following Rule 26(f) proposed discovery plan and schedule for the Court's consideration:

1. Deadline to Join Additional Parties: October 17, 2022
2. Deadline to Amend Pleadings: October 17, 2022
3. Other Motion Deadlines:
 - a. Discovery Motions: December 2, 2022
 - b. Dispositive Motions: February 6, 2023
4. Proposed Discovery Plan:
 - a. Deadline for Completion of Fact Discovery: January 2, 2023
 - b. Discovery Summary:

Discovery should not be conducted in phases or be limited to or focused on particular issues and no changes should be made in the limitations on discovery imposed under the Federal Rules or Local Rules.

Plaintiffs will seek discovery related to their claims and Defendant's defenses. Among other items, Plaintiffs will seek discovery concerning the amount that Defendants owe Plaintiffs under the parties' Hospital Services Agreement. Defendants will also seek discovery related to their defenses and Plaintiffs' claims, particularly billing discrepancies and verification of the services provided.

At the Rule 26(f) conference on July 12, 2022, Plaintiffs served their initial disclosures. That same day, Plaintiffs also served requests for production of documents, requests for admissions, and interrogatories on Defendants. Defendants also served their initial disclosures on July 12, 2022.

c. ESI Production:

The parties have discussed and will continue to discuss the disclosure, discovery, preservation and production of electronically stored information ("ESI"), and do not anticipate any issues with ESI discovery.

5. Estimated Length of Trial: 3 trial days; trial will be to a jury
6. Proposed Trial Date: July 2023
7. Protective Order: Defendants anticipate a need for a protective order, given the probability that personal health information and proprietary business information will be produced in discovery.
8. Pursuant to Fed. R. Civ. P. 5(b)(2)(E), the Parties consent to electronic service of documents, including discovery materials and correspondence, that are not filed with the Court.

July 19, 2022

Respectfully submitted,

<p><u>/s/ Ethan M. Lange</u> Patrick J. Stueve MO Bar # 37682 Ethan M. Lange MO Bar # 67857 Jordan A. Kane MO Bar # 71028 STUEVE SIEGEL HANSON LLP 460 Nichols Road, Suite 200 Kansas City, Missouri 64112 816-714-7100 (p) 816-714-7101 (f) stueve@stuevesiegel.com lange@stuevesiegel.com kane@stuevesiegel.com</p> <p>COUNSEL FOR PLAINTIFFS THE CURATORS OF THE UNIVERSITY OF MISSOURI AND CAPITAL REGION MEDICAL CENTER</p>	<p><u>/s/ R. Thomas Warburton</u> R. Thomas Warburton (MO Bar No. 65477) Bradley Arant Boult Cummings LLP One Federal Place 1819 5th Avenue N. Birmingham, AL 35203 205.521.8987 twarburton@bradley.com</p> <p>COUNSEL FOR DEFENDANTS CORIZON HEALTH, INC. AND CORIZON, LLC</p>
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CERTIFICATE OF SERVICE

I certify that on July 19, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send a notice of electronic filing to counsel of record.

/s/ *Ethan M. Lange*

Ethan M. Lange